

IN THE UNITED STATES DISTRICT COURT
FOR THE MIDDLE DISTRICT OF ALABAMA
NORTHERN DIVISION

DAVID PAHER and
PHILENA PAHER

Plaintiffs,

v.

UICI;
MEGA LIFE & HEALTH INSURANCE
COMPANY;
NATIONAL ASSOCIATION FOR THE
SELF EMPLOYED;
STEPHANIE TRANCHINA;
and FICTITIOUS DEFENDANTS
“A,” “B,” and “C,” whether singular or
plural, are those other persons,
corporations, firms, or other entities
whose wrongful conduct caused or
contributed to the cause of the injuries
and damage to the plaintiff, all of
whose true and correct names are
unknown to the at this time,
but which will be substituted by
amendment when ascertained,

Defendants.

CIVIL ACTION NO.: 2:06cv297-DRB

DECLARATION OF JOANN JONES

STATE OF TEXAS §

COUNTY OF TARRANT §

I, JoAnn Jones, declare as follows:

1. My name is JoAnn Jones, and I am an adult resident of Tarrant County, Texas over the age of twenty-one (21). I am currently employed as a Senior Claims Specialist in the Special Investigations Unit of The MEGA Life and Health Insurance Company (“MEGA”). I have

EXHIBIT

3

personal knowledge of the facts set forth herein, which are known by me to be true and correct, and if called as a witness, I could and would competently testify thereto.


2. According to the business records of MEGA, the difference between the dollar amount of claims submitted for Plaintiff Philena Paher and the benefits paid by MEGA is \$9,498.30.

3. According to the business records of MEGA, Plaintiff David Paher has paid premiums in an amount totaling approximately \$5,222.00.

4. According to the business records of MEGA, Plaintiff David Paher has paid dues of \$965.00 to the National Association for the Self-Employed.

5. I declare under penalty of perjury that the foregoing is true and correct.

DATED: March 30, 2006

BY: 
JoAnn Jones

458633